

GMP:BGK:KKO
F. #2012R00539

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

WILLIAM D. MERSEY,
also known as "Dollar Bill,"

Defendant.

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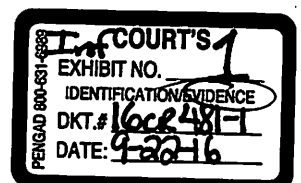
THE UNITED STATES ATTORNEY CHARGES:

COUNTS ONE THROUGH THREE
(Willfully Filing A False Tax Return)

On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant WILLIAM D. MERSEY, also known as "Dollar Bill," did willfully make and subscribe U.S. Individual Income Tax Returns, Forms 1040, for the tax years listed below, which were verified by written declaration that they were made under the penalties of perjury and which were filed with the Internal Revenue Service Center at Andover, Massachusetts, which tax returns the defendant did not believe to be true and correct as to every material matter, in that the returns stated at Line 22 that the defendant received total income in the amounts identified below, whereas, as the defendant then and there well knew and believed, he received materially more than he reported:

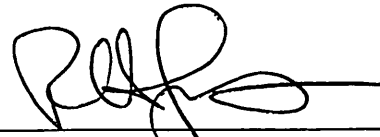
INFORMATION

Cr. No. 1:16cr481-WFK
(T. 18, U.S.C., §§ 3551 et seq.; T. 26,
U.S.C., § 7206(1))



COUNT	TAX YEAR	APPROXIMATE FILING DATE	FALSE ITEM
1	2010	March 28, 2011	Form 1040 – Total Income – Line 22, \$23,334
2	2011	April 2, 2012	Form 1040 – Total Income – Line 22, \$17,564
3	2012	March 29, 2013	Form 1040 – Total Income – Line 22, \$12,539

(Title 26, United States Code, Section 7206(1); Title 18, United States Code, Sections 3551 et seq.)



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK